

VU TELECOM LLC

Robocall Mitigation Plan

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FCC Form 499 Filer ID: 838136

1. Introduction

VU Telecom LLC is committed to preventing unlawful robocalls, protecting consumers, and maintaining compliance with all applicable Federal Communications Commission (FCC) regulations. This Robocall Mitigation Plan establishes the procedures, technologies, and compliance controls implemented by VU Telecom LLC to identify, prevent, monitor, and mitigate illegal robocall traffic throughout its network.

The company recognizes the importance of preserving trust in telecommunications services and actively works to ensure that all traffic originated, transmitted, or terminated through its network complies with federal and industry requirements.

2. Purpose and Scope

This Robocall Mitigation Plan applies to all customers, interconnected carriers, wholesale providers, resellers, and business partners whose traffic originates, passes through, or terminates on the VU Telecom LLC network.

The purpose of this plan is to:

- Prevent unlawful robocall traffic.
 - Detect and mitigate suspicious calling patterns.
 - Ensure compliance with FCC Robocall Mitigation Database requirements.
 - Support traceback investigations.
 - Protect consumers from fraudulent and illegal communications.
 - Maintain network integrity and service reliability.
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3. Regulatory Compliance

VU Telecom LLC complies with all applicable federal laws and regulations, including:

- Telephone Consumer Protection Act (TCPA)

- Truth in Caller ID Act
- TRACED Act
- FCC Robocall Mitigation Database Requirements
- STIR/SHAKEN Framework
- FCC Caller ID Authentication Rules
- USTelecom Industry Traceback Group Procedures

VU Telecom LLC does not knowingly accept traffic from providers that are not properly registered in the FCC Robocall Mitigation Database or those failing to meet applicable compliance obligations.

4. Technology-Based Mitigation Measures

1. STIR/SHAKEN Implementation

VU Telecom LLC supports the implementation of STIR/SHAKEN caller authentication standards to improve caller identity verification and reduce caller ID spoofing.

2. Traffic Analytics

The company utilizes automated traffic monitoring systems capable of identifying:

- High-volume robocall campaigns
- Unusual traffic spikes
- Spoofed caller ID activity
- Fraudulent call patterns
- Invalid ANI presentations

3. Reputation-Based Screening

Traffic is analyzed through reputation databases and industry intelligence sources to identify:

- Known spam callers
- Scam-related traffic
- Fraudulent call sources
- High-risk originating providers

4. IP Reputation Monitoring

Media IP addresses are continuously reviewed for suspicious behavior. Identified high-risk IPs may be blocked, restricted, or subjected to enhanced monitoring.

5. STIR/SHAKEN Attestation Policy

A-Level Attestation

VU Telecom LLC assigns A-Level Attestation only when:

- The customer has completed KYC verification.
- The customer has been assigned telephone numbers directly by VU Telecom LLC.
- The company has established a direct relationship with the customer.

B-Level Attestation

B-Level Attestation is assigned when:

- The customer has successfully completed KYC verification.
- The customer demonstrates lawful authority to use the calling number.
- Number ownership or right-to-use documentation is verified.

C-Level Attestation

VU Telecom LLC generally does not originate C-Attested traffic. Any transit traffic received with C-Attestation is subjected to enhanced review, risk analysis, and monitoring before being routed through the network.

6. Know Your Customer (KYC) Program

VU Telecom LLC maintains a comprehensive Know Your Customer program designed to verify customer legitimacy before services are activated.

Required verification includes:

- Business formation documents
- EIN verification
- FCC Registration Number verification
- FCC Form 499 Filer ID verification
- Physical business address verification
- Corporate contact validation
- Industry references when appropriate
- Review of robocall mitigation practices

No customer is activated until compliance review and risk assessment procedures are completed.

7. Traffic Monitoring and Analytics

VU Telecom LLC continuously monitors network traffic using multiple fraud-detection indicators, including:

- Answer Seizure Ratio (ASR)

- Average Call Duration (ACD)
- Short-duration call analysis
- Burst traffic detection
- Caller ID authentication validation
- ANI integrity verification
- Traceback correlation reviews
- Call completion performance metrics

Traffic anomalies are investigated promptly and escalated where appropriate.

8. Prohibited Traffic

The following traffic is strictly prohibited:

- Illegal robocalls
- Spoofed caller ID traffic
- Scam campaigns
- Phishing attempts
- Fraudulent calling activity
- Calls made without proper consent
- Traffic violating TCPA requirements
- Traffic violating federal or state regulations

Customers are contractually obligated to comply with all applicable laws and regulations as a condition of service.

9. Enforcement Policy

VU Telecom LLC maintains a strict compliance enforcement program.

Strike One – Warning

Upon identification of suspicious traffic:

- Customer receives formal notice.
- Customer must provide written corrective action documentation.
- Traffic is placed under enhanced monitoring.

Strike Two – Suspension

If violations continue:

- Services may be temporarily suspended.
- Additional compliance review is conducted.
- Customer must provide evidence of remediation.

Strike Three – Termination

Continued violations may result in:

- Immediate termination of service.
 - Removal of network access.
 - Reporting to applicable industry and regulatory entities when required.
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10. Traceback Response Program

VU Telecom LLC cooperates fully with:

- USTelecom Industry Traceback Group
- Federal Communications Commission
- Law Enforcement Agencies
- Industry Stakeholders

Traceback requests are reviewed and responded to promptly, generally within 24 hours whenever practicable.

The company maintains designated personnel responsible for traceback investigations and regulatory response activities.

11. Continuous Monitoring and Improvement

VU Telecom LLC maintains an ongoing compliance review process designed to:

- Evaluate mitigation effectiveness.
- Review enforcement outcomes.
- Analyse traffic trends.
- Update policies as regulations evolve.
- Improve fraud detection capabilities.

Consumer complaints and operational feedback are incorporated into the review process to strengthen mitigation controls.

12. Transparency and Accountability

VU Telecom LLC maintains internal records documenting:

- Mitigation activities
- Enforcement actions
- Traceback responses
- Compliance reviews
- Customer investigations

Management periodically reviews program performance to ensure continued compliance with FCC requirements.

13. Resource Allocation

VU Telecom LLC dedicates personnel, technology resources, and operational processes necessary to support:

- STIR/SHAKEN compliance
 - KYC verification
 - Fraud monitoring
 - Traffic analytics
 - Traceback investigations
 - Regulatory reporting
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14. Periodic Review and Customer Revalidation

The company performs periodic reviews of:

- Customer information
- FCC registrations
- 499 Filer information
- Traffic profiles
- Consent practices
- Compliance documentation

Customers may be required to provide updated information as part of ongoing compliance verification.

15. Record Retention

VU Telecom LLC maintains records supporting robocall mitigation compliance for a minimum of two (2) years or longer where required by law.

Records may include:

- Call Detail Records (CDRs)
- STIR/SHAKEN authentication logs
- KYC documentation
- Traceback requests and responses
- Customer complaints
- Enforcement actions
- Traffic monitoring reports
- Fraud investigation records

All records are securely maintained and made available to authorized regulatory authorities upon lawful request.

Authorized Representative

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